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13 Attorneys for Defendant, TARGET CORPORATION

14 UNITED STATES DISTRICT COURT
15 CLARK COUNTY, NEVADA

16 CONNIE CRAWFORD-MURRAY,

17 Plaintiff,

18 v.

19 TARGET CORPORATION; DOES I through
20 XX, and ROE BUSINESS ENTITIES I through
21 XX, inclusive,

22 Defendants.

CASE NO: 2:22-cv-00233-RFB-DJA

23 **STIPULATION AND ORDER TO
24 EXTEND DISCOVERY DEADLINES
(SECOND REQUEST)**

25 Pursuant to Fed. R. Civ. P. 6, Fed. R. Civ. P. 26, LR 26-1 and LR 26-4, Plaintiff, CONNIE
26 CRAWFORD-MURRAY ("Plaintiff"), by and through their attorney of record, CLIFF MARCEK,
27 ESQ. of the law firm BERTOLDO BAKER CARTER SMITH & CULLEN and Defendant, TARGET
28 CORPORATION, by and through its attorney of record, JULIE A. FUNAI, ESQ. of the law firm
LINCOLN, GUSTAFSON & CERCOS, LLP, and hereby stipulate and agree to a ~~one hundred and~~ ^{sixty (60) day}
~~twenty (120) day~~ continuance of the current discovery deadlines.

29 **I. DISCOVERY COMPLETED**

- 30 1. Plaintiff, CONNIE CRAWFORD-MURRAY served her FRCP 26(a)(1) Initial List of
31 Witnesses and Documents on May 9, 2022.

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2. Defendant, TARGET CORPORATION served its FRCP 26(A)(1) Initial Disclosure on May 11, 2022.
3. Defendant, TARGET CORPORATION served their Objection to Plaintiffs Initial List of Witnesses and Documents on May 19, 2022.
4. Defendant, TARGET CORPORATION propounded its First Set of Interrogatories and Requests for Production of Documents to Plaintiff on June 22, 2022.
5. Plaintiff served her responses to Defendant TARGET CORPORATION First Set of Interrogatories and Requests for Production of Documents on August 19, 2022.
6. Plaintiff, CONNIE CRAWFORD-MURRAY propounded her First Set of Interrogatories, Requests for Production of Documents, and Requests for Admission to Defendant TARGET CORPORATION on August 22, 2022.
7. Plaintiff, CONNIE CRAWFORD-MURRAY served their First Supplement to FRCP 26(A)(1) Initial List of Witness and Documents on September 30, 2022.
8. Defendant served its responses to Plaintiff CONNIE CRAWFORD-MURRAY's First Set of Interrogatories, Requests for Production of Documents and Requests for Admission on October 5, 2022.
9. Defendant TARGET CORPORATION served its First Supplemental Disclosures Pursuant to FRCP 26(a)(1) on April 27, 2023.
10. Deposition of Plaintiff CONNIE CRAWFORD-MURRAY.

II. DISCOVERY REMAINING TO BE COMPLETED

In addition, Defendant wishes to conduct the remaining discovery:

1. Depositions of percipient witnesses
2. Depositions of FRCP 30(b)(6) witnesses
3. Expert designation and depositions of expert.
4. Site Inspection.
5. Additional discovery as needed.

1 **III. REASONS WHY DISCOVERY SHOULD BE EXTENDED**

2 Plaintiff counsel extensive trial schedule, with trial January through March 2023, caused
3 delayed discovery and deposition scheduling. New counsel, Cliff Marcek recently took overhandling
4 the case for Plaintiff at Bertoldo Carter Smith & Cullen on April 27, 2023. Additionally, the parties
5 wish to engage in resolution discussions, including, but not limited to, the scheduling of private
6 mediation. The parties wish to avoid unnecessary costs, fees and expenses in the interest of potential
7 resolution. The additional time will allow for the parties to schedule private mediation, and if
8 unsuccessful, conduct the remaining discovery, including depositions.

9 **PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY**

10 Plaintiff and Defendant have agreed to extend the current discovery deadline herein for sixty
11 (60) days to complete the remaining discovery as outlined above. If approved, the new discovery
12 deadlines would be modified as follows:

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EVENT DEADLINE	CURRENT DATE	PROPOSED DATE
Close of Discovery	8/23/2023	10/23/2023
Motions to Amend Pleadings	5/25/2023	7/25/2023
Initial Expert Disclosures	6/26/2023	8/25/2023
Rebuttal Expert Disclosures	7/22/2023	9/25/2023
Dispositive Motions	9/22/2023	11/22/2023
Joint Pre-Trial Order	10/24/2023	12/22/2023

IT IS SO STIPULATED AND AGREED.

DATED this 16th day of May, 2023.

DATED this 16th day of May, 2023.

LINCOLN, GUSTAFSON & CERCOS, LLP

BERTOLDO BAKER CARTER SMITH & CULLEN

/s/ Julie A. Funai

/s/ Cliff W. Marcek

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CONNIE CRAWFORD-MURRAY

ORDER

IT IS SO ORDERED.



DANIEL J. ALBRERGTS

UNITED STATES MAGISTRATE JUDGE

DATED: May 18, 2023